

## **Privacy Notice**

### **Who holds your data?**

Your information will be held by Paycare. Paycare is a Health Cash Plan provider and our office is situated at Paycare House, George Street, Wolverhampton, WV2 4DX. For more details on Paycare please refer to [www.paycare.org](http://www.paycare.org)

To contact our Data Protection Officer please email [GDPRTeam@paycare.org](mailto:GDPRTeam@paycare.org).

### **Why do we require certain information about you?**

We require certain personal information in order for us to manage our relationship with you as a policyholder and fulfil your expectations. The list below shows the data required in order for us to ensure this. Also by storing certain data it allows us to define and develop products and services to ensure best value, which then assists in us being able to run Paycare in an efficient and professional manner.

**Name** – This is a contractual requirement to enable us to identify you and personalise any documents we communicate to you.

**Address** – This is a contractual requirement so that we can identify you and a form of communication with you.

**Date of Birth** – This enables us to identify you, ensure that you are eligible for cover and check that you are in the correct policy for your age group. Date of birth is also used for internal data analysis, but this is anonymised. Your date of birth is also required when you first register on the members' area of the Paycare website (MyPaycare) as a form of identification.

**E-Mail Address** – This is a form of communication so that we can contact you, as well as a form of identification. We use this to communicate with you on information relating to your Paycare Policy. We require consent to send marketing to you (our monthly Paycare Newsletter).

**Gender** – This is collected for internal data analysis (anonymised).

**Telephone Number** (Home or Mobile) – This is a form of communication so that we can contact you, and also a form of identification.

**Bank Details** – This is a legitimate interest in order for us to collect your premiums if paying by Direct Debit and pay claims into the account when applicable.

**Employer** – Some companies provide Paycare for their employees or allow premiums to be paid via payroll deduction. This is the reason why we may ask for your employer details.

**Dependant Details** – This is a contractual requirement if making a claim for a dependant, as in some of our policies you can claim for dependent children up to the age of 17. We would require the details of the child (name, address and date of birth).

**Claims History** – This is a contractual requirement to ensure eligibility on all claims made by you.

**Payroll Number** – If you pay your premiums via payroll deduction this is required in order for your employer and us to identify you when completing the payroll authority.

**Personal Sensitive Details**

Type	Reason
Pre-Existing Medical Condition	To establish whether it would be covered on the policy when joining
Medical Condition	To establish whether it would be covered on the new policy when changing policy or increasing your cover
Medical information is required to support Hospital in Patient or Specialist Consultation claims	To allow us to assess and process Benefit Claim for Hospital in Patient or Specialist Consultation in line with Policy Documents issued at the time of joining
Further information from the relevant practitioner/hospital	In some instances, following consent given by you we would contact the practitioner/hospital to further information in order for us to assess and process Benefit Claim to establish eligibility for payment.

**How we use your personal information?**

This Privacy Notice is to let you know what personal information Paycare holds, how it is looked after, the reason for requiring the information, what is done with it and how long is it kept for. We use your information to provide our services, for assessment and analysis for claims handling, to develop and improve our services to you and other customers, and to protect our interests regarding enabling our not for profit company to continue to offer the services to Policyholders. This Privacy Notice explains how we do this and tells you about your privacy rights and how the law protects you.

Failure to provide the relevant data would mean that we are unable to offer the contractual obligation of being a Policyholder.

Here is a list of the ways that we may use your personal information, and which of the legal conditions we rely on to do so.

What we use your Personal data for	Legal Condition	Reasoning
Contact Details are used for communicating to you about your Paycare policy	Contractual	To have a Paycare Policy, we need to have your contact details so that we can fulfil our contractual obligations, such as communicating any important changes to your Paycare Policy to you
Contact Details are used for sharing the monthly Paycare newsletter with you	Consent	We require your consent in order to inform you of new products, services and information on Paycare, our Partners and our Community
Processing Claims	Contractual	We need to process any claims submitted by you so that we can fulfil our contractual obligations regarding any repayments
Claims History	Contractual	We need to keep a claim history of any claims you submit to establish eligibility for any claim payments due as part of our contractual obligations

Date of Birth	Contractual	We require your date of birth so that we can establish if you are eligible for any Paycare Policy, and to verify your identity when discussing your Paycare Policy with you
To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audits.	Legitimate Interest	Comply with regulations that apply to Paycare
To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audits.	Legal Duty	Enable us to be comply with regulations and be efficient about how we fulfil our legal and contractual duties

### Marketing

We may use your personal information to tell you about relevant products and offers relating to your Paycare Service as part of our monthly Paycare Newsletter. This is what we mean when we talk about 'marketing'.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information to contact you, and it must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time. Please contact us via;

- call our Customer Service Team on 01902 371000
- e-mail us at [enquiries@paycare.org](mailto:enquiries@paycare.org)
- Write to us at Paycare House, George Street, Wolverhampton, WV2 4DX.
- By clicking unsubscribe at the bottom of Paycare's marketing e-mails.

Whatever you choose, you'll still receive important information such as changes to your existing Policy through your preferred method of contact. If you want to change your preferred method of contact you can do this in the following ways;

- call our Customer Service Team on 01902 371000
- e-mail us at [enquiries@paycare.org](mailto:enquiries@paycare.org)
- write to us at Paycare House, George Street, Wolverhampton, WV2 4DX.

### Where do we collect personal information from?

We collect personal information about you from the following sources:

- When you apply for our products and services either on-line via our website or completing an application form.
- When you join via another policyholder and their policy.
- From your employer who is providing Paycare for you and they have authorisation to share your data with us.
- When you communicate with us via telephone or e-mail.
- When you use the members area of our website (MyPaycare).

### How long is the Data Kept For?

We have a Retention Policy and schedule which identifies how long each aspect of your data should be kept for, with a legal, regulatory and justifiable business needs. We do not keep data for any longer than is required.

Paycare Policyholder Data Retention	
Policyholder Records	2 Years after policy ceased
Processed Claims	7 Years whilst active policyholder
Payment Card Data	7 Years
Call recordings	12 months of final response from Paycare
Direct Debit Data	2 years

### Updating Personal Data

To the best of our ability we aim to ensure that any personal data we hold is accurate, up to date and correct. We need your help with this; if you don't tell us something has changed we won't know, so please keep us informed. You can do this through the members' area of the Paycare website (MyPaycare); by selecting "My Account" and updating your Address, Phone Number, E-mail Address or Bank Details.

If we receive a request from you to amend the records, we will take reasonable steps to satisfy ourselves that the data is accurate and to rectify the data if necessary. Should you wish to contact us regarding any updates please either call our Customer Service Team on 01902 371000, e-mail us at [enquiries@paycare.org](mailto:enquiries@paycare.org) or write to us at Paycare House, George Street, Wolverhampton, WV2 4DX.

### Who your data is shared with?

Paycare may share your data with regulatory bodies when it is a legal requirement to do so for the purpose of monitoring and enforcing our compliance;

- Financial Ombudsman Service
- Information Commissioners Office
- Fraud prevention agencies

We may also share aspects of your information on occasion with organisations to enable continuity of service, these include;

- Organisations that introduce you to us
- Call Recording Support
- IT Support

### Where is your Data Stored?

All of your data is located in the UK.

### Cookies

#### What Are Cookies?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies are a way for websites to store and retrieve very small text information on a web browser. These are designed to improve your online experience by keeping track of users as they view pages and allow a website to remember your actions and

preferences. There are various types of cookies although they all work in the same way but have minor differences.

Most web browsers allow some control of most cookies through the browser settings. You can usually find these settings in the Options or Preferences menu of your browser. To understand these settings, the following links may be helpful, or you can use the Help option in your browser for more details.

[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari web and iOS.](#)

### **Paycare's Cookie Policy**

The Paycare website makes limited use of cookies to personalise and improve the overall experience for users without storing any kind of personal or sensitive information. Our cookies are only used to improve the user's experience and navigation with the website. They are limited to information that is not personally identifiable, such as a session ID. (A session ID is a unique number that a website's server assigns a specific user for the duration of that user's visit).

The Paycare website also makes use of third party cookies from Google. These are used to collect statistical information about how visitors use our website including details of the location of users and device/software used to view the site. All information collected in this way is strictly aggregated and anonymous.

### **Types of Cookies used by Paycare**

**First party cookies** are those set by or on behalf of the website visited, below are the first party cookies used by Paycare;

**ASP.NET\_SessionId** is a first party cookie. This cookie is necessary for the website to function properly it contains no private information and is automatically deleted when you close your browser.

+ **PaycareCookiePolicy** - This cookie is used to display a one-time cookie notification for first-time visitors to the Paycare website.

+ **PaycareUID** - This cookie is used to personalise the information shown to registered users on Paycare website.

**Session cookies** last only for the duration of your visit and are deleted when you close your browser. These facilitate various tasks such as allowing a website to identify that a user of a particular device is navigating from page to page, supporting website security or basic functionality. This type is used by Paycare Website.

**Persistent cookies** last after you have closed your browser, and allow a website to remember your actions and preferences. This type of cookie is used by Paycare's website to remember your e-mail address for sign in and the avatar details on "My Paycare".

Here is a list of cookies used by third parties on the Paycare website:

+ **\_utma, \_utmz, \_utmc, \_utmb** - These cookies are set and used by Google Analytics to provide statistical reports about visitors on the Paycare website. For details of Google Analytics see below.

### **Google Analytics**

We use Google Analytics on our website for anonymous reporting of site usage. If you would like to opt-out of this please visit our website and amend your internet settings for cookies.

To opt out of being tracked by Google Analytics across all websites visit;

[http://tools.google.com/dlpage/gaoptout.](http://tools.google.com/dlpage/gaoptout)

### **Access to your Data**

You have the right to request a copy of all information about you held by Paycare. If you would like a copy of some or all your personal data please e-mail [GDPRTeam@paycare.org](mailto:GDPRTeam@paycare.org) or write to us at Paycare House, George Street, Wolverhampton, WV2 4DX.

### **Data Portability**

You have the right to exercise your right to data portability in certain circumstances. Should you wish to do so please e-mail [GDPRTeam@paycare.org](mailto:GDPRTeam@paycare.org) or write to us at Paycare House, George Street, Wolverhampton, WV2 4DX.

### **What if you want us to stop using your personal information?**

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

Regarding marketing, you can ask us to stop sending you marketing messages by contacting us at any time. Please contact us via;

- call our Customer Service Team on 01902 371000
- e-mail us at [enquiries@paycare.org](mailto:enquiries@paycare.org)
- Write to us at Paycare House, George Street, Wolverhampton, WV2 4DX.
- By clicking unsubscribe at the bottom of Paycare's marketing e-mails.

Whatever you choose, you'll still receive important information such as changes to your existing Policy through your preferred method of contact. If you want to change your preferred method of contact you can do this in the following ways;

- call our Customer Service Team on 01902 371000
- e-mail us at [enquiries@paycare.org](mailto:enquiries@paycare.org)
- write to us at Paycare House, George Street, Wolverhampton, WV2 4DX.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, if this is the case we would not use or share your information in other ways whilst it is restricted. You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- You have already asked us to stop using your data but you are waiting for us to tell you if we can keep on using it.

If you would like to contact us on any of the above please e-mail [GDPRTeam@paycare.org](mailto:GDPRTeam@paycare.org) or write to us at Paycare House, George Street, Wolverhampton, WV2 4DX.

### **Right to Complain**

Should you not be happy with the way we handle your personal data, you have the right to complain. Details on how to complain are on our website [www.paycare.org/complaints](http://www.paycare.org/complaints) or you can contact us via [GDPRTeam@paycare.org](mailto:GDPRTeam@paycare.org) or write to us at Paycare House, George Street, Wolverhampton, WV2 4DX

### **Changes to our Privacy Notice**

We keep our Privacy Notice under regular review and we will place any updates on the Paycare Website. The notice was last updated in April 2018.

**How to contact us**

Please contact us if you have any questions about our Privacy Notice or any information we hold on you by; e-mail [GDPRTeam@paycare.org](mailto:GDPRTeam@paycare.org)

Write to us – Paycare House, George Street, Wolverhampton, WV2 4DX.